BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Rulemaking to Amend Parts 1, 2, 21,	)	
and 25 of the Commission's Rules	)	
to Redesignate the 27.5-29.5 GHz	)	
Frequency Band, to Reallocate the	)	
29.5-30.0 GHz Frequency Band, to	)	
Establish Rules and Policies for	)	CC Docket No. 92-297
Local Multipoint Distribution	)	
Service and for Fixed Satellite	)	
Services	)	

To: The Commission

REPLY COMMENTS
OF THE
INTERNATIONAL MUNICIPAL SIGNAL ASSOCIATION

INTERNATIONAL MUNICIPAL SIGNAL ASSOCIATION

Martin W. Bercovici
Nicole B. Donath
KELLER AND HECKMAN LLP
1001 G Street, NW
Suite 500 West
Washington, DC 20001
(202) 434-4100

Its Attorneys

August 22, 1996

TABLE OF CONTENTS

SUMMARY

IMSA has serious concerns about the recent proposal of the Federal Communications Commission to allocate spectrum in the 31 GHz band to Local Multipoint Distribution Service ("LMDS") on a primary protected basis. This spectrum is currently used by numerous public safety entities to provide traffic signal control and monitoring services that reduce congestion in busy intersections and combat air pollution by controlling vehicle emissions. Because it may be prohibitively expensive for many of these incumbent licensees to relocate their operations to an alternative frequency band, the Commission's reallocation proposal threatens to deprive citizens in certain regions of these valuable traffic and pollution management services.

IMSA strongly disputes the claim of various LMDS interests that incumbent licensees may be displaced or subjected to harmful interference because they currently are authorized to operate only on a secondary, non-interference basis. In initially allocating the 31 GHz band to its current uses, the Commission emphasized that applicable technical requirements would provide licensees with effective protection from harmful interference. Based upon that understanding, state and local governments have sought

use of the 31 GHz band, have invested in 31 GHz facilities, and, until now, have been able to operate without encountering any significant interference problems. Under these circumstances, incumbent licensees certainly have an interest in continued unencumbered use of the 31 GHz band.

In any event, the Commission's allocation decisions must advance not only the rights and interests of individual licensees, but also the broader public interest. Among the relevant public interest considerations is the effect that a proposed spectrum reallocation may have upon the environment. Many of the regions that utilize 31 GHz traffic management systems to fight air pollution have been identified by the Environmental Protection Agency as areas whose air quality currently does not meet the standards of the Clean Air Act. Thus, if the Commission redesignates the 31 GHz band without ensuring that incumbent systems will be able to continue operating, such action undoubtedly will exacerbate the serious air pollution problems that now face many urban areas. While IMSA is optimistic that 31 GHz incumbents and future LMDS licensees will be able to negotiate a band-sharing arrangement, the Commission cannot simply rely upon private initiative and good faith to preserve vital traffic signal control operations.

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Rulemaking to Amend Parts 1, 2, 21, and 25 of the Commission's Rules to Redesignate the 27.5-29.5 GHz Frequency Band, to Reallocate the 29.5-30.0 GHz Frequency Band, to Establish Rules and Policies for Local Multipoint Distribution Service and for Fixed Satellite Services	)	**CC Docket No. 92-297**

To: The Commission

REPLY COMMENTS
OF THE
INTERNATIONAL MUNICIPAL SIGNAL ASSOCIATION

The International Municipal Signal Association ("IMSA"), by its attorneys, pursuant to Section 1.415 of the Rules and Regulations of the Federal Communications Commission ("Commission"), respectfully submits these Reply Comments in response to Comments filed by other parties regarding the Commission's proposal to designate, on a primary protected basis, the 31.0-31.3 GHz ("31 GHz") band to Local Multipoint Distribution Service ("LMDS").[1/] As explained herein, IMSA is opposed to this proposal to the extent that it would result in unacceptable interference to

---

1/ The Commission presented this proposal in its Fourth Notice of Proposed Rule Making ("Fourth NPRM"), adopted in the above-captioned proceeding on July 17, 1996.

incumbent traffic signal control operations in the 31 GHz band or necessitate the relocation of these operations to other frequencies without adequate compensation.

I. INTRODUCTION

1. IMSA is a non-profit organization dedicated to the development and use of electrical signaling and communications systems in the furtherance of public safety. IMSA members include representatives of federal, state, county, city, township and borough governmental bodies, and representatives of governmental bodies from foreign nations. Organized in 1896, IMSA is the oldest organization in the world dedicated to the activities pertaining to electrical engineering, including the Public Safety use of radio technology.

2. Many governmental agencies represented by IMSA's membership utilize 31 GHz frequencies to provide important traffic signal control and monitoring services. In particular, numerous municipalities throughout the nation use short haul point-to-point radio links in the 31 GHz band to supply signal timing and coordination data to signalized intersections. Such traffic signal coordination has proven very effective in reducing vehicle stops, congestion and delay in urban areas. Optimal congestion management, in turn, reduces energy consumption and vehicle emissions,

thereby ameliorating the air pollution problems that plague many of our nation's cities.

3. Use of the 31 GHz band in the manner described above provides a cost-effective and efficient means to coordinate traffic signals. Ever important to governmental agencies, 31 GHz signaling is significantly less costly than the traditional method of interconnecting signals using underground cable. Also of critical importance in selecting a signaling system, 31 GHz technology, unlike underground cable, is immune to damage from street repairs or improvements. Further, while signal control operations in the 31 GHz band are authorized only on a secondary basis, various technical rules currently in effect have afforded incumbent licensees de facto protection against disruptive interference and have, as a result, encouraged continued and increasing use of the band for traffic signal control purposes.

4. IMSA believes that the foregoing considerations, coupled with the fact that many existing licensees have invested a considerable amount of taxpayer dollars in their 31 GHz systems, require the Commission to take a harder look at how its proposed allocation of the 31 GHz band to LMDS on

a primary protected basis will affect incumbent licensees and, more importantly, the public interest.

II. REPLY COMMENTS

A. The Public Interest Requires the Continued Unencumbered Use of the 31 GHz Band for Traffic Signal Control Services.

5. Certain parties that stand to benefit from the Commission's proposed designation of the 31 GHz band to LMDS argue in their Comments that incumbent 31 GHz licensees have no rights to protection from interference and may be forced to relocate to another frequency band without compensation.[2/] This position is unpersuasive. As Sierra Digital Communications, Inc. ("Sierra") correctly points out in its Comments, Section 303 of the Communications Act requires the Commission to make its allocation decisions in the *public* interest.[3/] This typically will necessitate consideration by the Commission of a broad range of factors, rather than just the narrow question of whether existing

---

[2/] See, e.g., Comments of the Wireless Cable Association International, Inc. ("WCA") at 3; Comments of Rio Vision, Inc. ("Rio Vision") at 2; Comments of Hughes Communications Galaxy, Inc. at 2; Comments of Texas Instruments, Inc. at 8-9.

[3/] Comments of Sierra at 8.

licensees technically may be entitled to protection against interference.

6. While some public value certainly is derived from the promotion of new commercial technologies such as LMDS, the Commission simply cannot ignore the corresponding public detriment that may result from its displacement of important governmental services such as traffic signal coordination facilities. For the reasons set forth below, the balance of equities and public interest considerations in this instance favors the continued use of the 31 GHz band by traffic signal control licensees without an added risk of interference from other spectrum users.

1. The Commission Must Consider the Potential Harm to the Environment That May Result From the Displacement of Existing 31 GHz Licensees.

7. As a number of parties have emphasized in their Comments, traffic signal control systems play a crucial role in the reduction of air pollution in urban areas. Sierra, for example, explains that traffic signal interconnection "reduce[s] the pollution caused by vehicles idling at stoplights."[4/] Similarly, the cities of Topeka, San Diego and Long Beach each note that the effective coordination of

---

4/ Comments of Sierra at 3.

traffic signals is vital to their efforts to reduce energy consumption and vehicle emissions.[5/] Indeed, the Mobile Source Air Pollution Reduction Review Committee of the South Coast Air District of the State of California ("MSRC") comments that it has funded -- "as a specific air pollution reduction strategy" -- the synchronization of traffic signals using short-haul microwave links in the 31 GHz band.[6/] MSRC further states that the proposed reassignment of the 31 GHz band to LMDS may "negate the air quality and congestion management benefits achieved through [its] signal synchronization projects."[7/]

8. In light of the foregoing, IMSA firmly supports the position of Sunnyvale General Devices and Instruments, Inc. ("Sunnyvale") that the National Environmental Policy Act of 1969 ("NEPA") requires the Commission to consider the potential environmental impact of its 31 GHz reallocation proposal before acting on the Fourth NPRM.[8/] Regulations implementing NEPA direct federal agencies to, among other things, "[u]se all practicable means ... to restore and

---

[5/] Comments of the City of Topeka at ¶ 1; Comments of the City of San Diego at 1; Comments of the City of Long Beach at 3.

[6/] Comments of MSRC at 2.

[7/] Id.

[8/] Comments of Sunnyvale at 5-7.

enhance the quality of the human environment and avoid or minimize any possible adverse effects upon the quality of the human environment." 40 C.F.R. § 1500.2(f). To this end, federal agencies must, for instance: integrate the NEPA process with other planning at the earliest possible time to ensure that their decisions "reflect environmental values"; integrate natural and social sciences with "environmental design arts" in making decisions which may impact the environment; and identify environmental effects in adequate detail for comparison to economic and technical analyses. 40 C.F.R. § 1501.2.

9. The Commission's own Rules and Regulations also contain NEPA implementation provisions. See 47 C.F.R. §§ 1.1301-1.1319. In accordance with these provisions, the Commission must prepare an Environmental Impact Statement ("EIS") with respect to any action deemed to have a significant effect upon the quality of the human environment. 47 C.F.R. § 1.1305. The Commission also is required to consider any significant environmental concerns regarding its actions that are brought to its attention by interested parties. 47 C.F.R. § 1.1307(c).

10. The contribution of vehicle emissions to air pollution clearly is an environmental concern worthy of the

Commission's careful consideration. Finding that "the growth in the amount and complexity of air pollution brought about by ... the increasing use of motor vehicles, has resulted in mounting dangers to the public health and welfare," Congress enacted the Clean Air Act of 1955 "to encourage and assist the development and operation of regional air pollution prevention and control programs." 42 U.S.C. § 7401.

11. More than thirty state, county and city governments located in at least ten different states use traffic control systems operating on 31 GHz frequencies to reduce congestion and vehicle emissions.[9/] These licensees include a number of large cities and counties such as Charlotte, North Carolina and Cobb County, Georgia, as well as the state departments of transportation in California, Wisconsin and Washington State.[10/] In addition, the demand for 31 GHz traffic coordination systems has been growing in

---

9/ Comments of Sierra at 4.

10/ A list of a number of current 31 GHz licensees, generated from the Commission's data base, is attached hereto as Exhibit A. As noted by several commentors, there actually may be significantly more 31 GHz licensees than are identified on this list. See also Comments of Sierra at 4-5.

recent years; this trend is expected to continue in the future.[11/]

12. Many of the regions that currently use 31 GHz systems to monitor and control traffic signals have been designated "nonattainment" areas that fail to satisfy certain Clean Air Act standards. Parts of San Bernadino County, California, for example, have a "serious nonattainment" status designation for carbon monoxide. 40 C.F.R. § 81.305. Further, the Sacramento metropolitan area, parts of San Bernadino County and Milwaukee, Wisconsin have "severe nonattainment" status designations for ozone levels, while San Diego has been designated a "serious" ozone nonattainment area. Id.

13. Under the Clean Air Act, serious and severe nonattainment areas must develop and submit an implementation plan containing a "transportation control measures program." 42 U.S.C. §§ 7511a(c)(5) and 7511a(d). This program must consist of (but need not be limited to) specified "transportation control measures," including "traffic flow improvement programs that achieve emission

---

[11/] See Comments of Sierra at 5; Comments of the City of Long Beach at 4; Comments of the City and County of Honolulu at 1.

reductions." 42 U.S.C. §§ 7408(f)(1)(A)(v); 7511a(c)(5) and 7511a(d).

14. Accordingly, the Commission's proposed displacement of traffic signal control licensees from the 31 GHz band may hamper the ability of "nonattainment" areas to improve their air quality in accordance with Clean Air Act standards. As explained below, the relocation of these incumbent operations to another frequency band is not a viable alternative. IMSA therefore asks the Commission to reassess its proposal in light of the potential detrimental effects it may have on the air quality of numerous regions throughout the country.

2. Incumbent Traffic Control System Licensees Selected the 31 GHz Band and Invested in Their Systems Based Upon the Reasonable Assumption That the Potential for Harmful Interference was Remote.

15. Noting that existing 31 GHz licensees are not entitled to protection from interference, the Commission contends that these licensees should have chosen another frequency band if they believed that their operations were critical in nature and warranted interference protection.[12/] Echoing this sentiment, WCA proclaims that because

---

12/ Fourth NPRM at ¶ 102.

incumbents in the 31 GHz band "have no rightful expectation of protection from interference," the 31 GHz band "can be readily reallocated for LMDS use."[13/]

16. These arguments ignore both the Commission's intent in originally allocating the 31 GHz band and the practical reality of 31 GHz operations under currently applicable technical rules. First, incumbent 31 GHz traffic signal control licensees are not typical "secondary" spectrum users in that all other categories of licensees in the band are equally unentitled to interference protection.[14/] In other words, traffic signal control licensees are not required to protect any other current users against harmful interference.

17. Further, several parties explain in their Comments that although existing 31 GHz licensees do not have legal protection from interference in the form of primary status or frequency coordination, the Commission's technical rules provide these licensees with effective de facto protection against harmful interference.[15/] Specifically, the

---

13/ Comments of WCA at 3.

14/ See Fourth NPRM at ¶ 96.

15/ Comments of Sierra at 6; Comments of the City of Topeka at ¶ 2.

limitation of transmitter power levels to 0.05 watts and antenna minimum gain requirements "provide a high degree of immunity from other licensed operators."[16/]

18. As Sierra also points out, the Commission explicitly recognized in making its original 31 GHz allocation that these and other factors would limit the potential for harmful interference and that the lack of frequency coordination requirements would satisfy the need of certain prospective licensees for a flexible licensing approach devoid of unnecessary burdens.[17/] Thus, traffic signal control system licensees had every reason to believe from the outset that the 31 GHz band constituted optimal spectrum in which to operate their vital facilities. Under these circumstances, it would be patently unfair to displace these licensees from the 31 GHz band or subject them to harmful interference on the grounds that they "should have" selected other frequencies if they had desired interference protection.

16/ Comments of Sierra at 6-7. See also Comments of the City of Topeka at ¶ 2.

17/ Comments of Sierra at 7 (citing Fixed and Mobile Services, 57 R.R.2d 1162 (1985) (Second Report and Order)).

3. Relocation to the 23 GHz Band Would be Costly, Inefficient and Unduly Burdensome.

19. IMSA agrees with the view of several commenting parties that the relocation of 31 GHz incumbents to the 23 GHz band is not a feasible alternative. Many existing licensees have invested a significant amount of public funds in their 31 GHz systems.[18/] Sierra, a leading supplier of fixed service point-to-point 31 GHz microwave radio links, estimates that the cost of modifying existing 31 GHz radios to operate at 23 GHz or replacing them with 23 GHz equipment would be between $5,000 and $15,000 per terminal -- significantly more than the cost of the original 31 GHz equipment.[19/] Other associated costs also would be incurred, including the development and installation of a new casing for each 23 GHz facility.[20/] As a result of these factors, moving to the 23 GHz band well may impose a financial hardship on numerous public entities.[21/]

[18/] The City of Long Beach, for example, has spent over $1.5 million on the purchase of short haul point-to-point radio links in the 31 GHz band. Comments of the City of Long Beach at 3. The City of Topeka (which has a population of only about 120,000) has a current investment of $165,000 in its 31 GHz traffic management system. Comments of the City of Topeka at ¶ 1.

[19/] Comments of Sierra at 12-13.

[20/] Comments of Sierra at 13.

[21/] See Comments of the City of Topeka at ¶ 3.

20. Should the Commission nonetheless determine that relocation is required, IMSA urges it to adopt provisions to ensure that 31 GHz incumbents receive full compensation for their relocation costs. Otherwise, some public entities may be forced by financial constraints to cease operation of their traffic signal coordination systems, to the detriment of the public's interest in clean air and the alleviation of traffic congestion. Moreover, for the reasons identified above, the fact that existing licensees lack legal protection against interference does not mean that their displacement from the 31 GHz band without compensation would be in the public interest.

21. Contrary to the suggestion of ComTech Associates, Inc. ("CTA"), the fact that disagreements have arisen in connection with the 2 GHz microwave relocation negotiation process does not provide a basis for denying needed compensation to 31 GHz incumbents and thereby threatening the public interest.[22/] Rather, the Commission should build upon its experience in the 2 GHz matter and seek to develop clear relocation reimbursement procedures that will minimize the likelihood of subsequent disputes. One possible approach is CTA's proposal that the Commission "reimburse

---

22/ See Comments of CTA at 7.

the current 31 GHz users from auction revenues,"[23] provided that adequate funds will be available and full reimbursement is guaranteed.

4. Regardless of the Outcome of this Proceeding, the Commission Should Continue to Accept New Applications, License Renewals and Modification Applications.

22. The Commission sought comment in its Fourth NPRM on whether it should accept any new applications, modifications or renewal applications in the 31 GHz band.[24] IMSA supports the City of Topeka's proposal that if LMDS becomes a primary protected use in the 31 GHz band, incumbent public safety licensees should be provided frequency protection or compensation under a "grandfather clause" and should be allowed to renew or modify their licenses accordingly.[25] Only in this way would existing licensees be able to preserve the value of their investments in 31 GHz facilities.

23. IMSA also agrees with Sierra that pending resolution of the Fourth NPRM, new applications should be

---

[23] Id.

[24] Fourth NPRM at ¶ 103.

[25] Comments of the City of Topeka at ¶ 4.

permitted "subject to the risk of interference from LMDS."[26/] This approach would relieve the concern of certain parties that the granting of new licenses may increase compensation payments owed by future LMDS licensees or heighten interference problems.[27/] So long as new licensees do not obtain the right to reimbursement or protection from interference, subsequent LMDS licensees in the band would not be harmed by the Commission's continued acceptance of applications.

B. Alternatives to the Displacement of Incumbent 31 GHz Systems Should be Explored.

24. In view of the circumstances presented here (as set forth above), IMSA urges the Commission seriously to consider any potential alternatives to the relocation of traffic signal interconnection licensees from the 31 GHz band. One such alternative, which was raised by CTA, is the allocation to LMDS of a contiguous 1 GHz block of spectrum (27.35-28.35 GHz).[28/] This approach, notes CTA, "may obviate the need for an LMDS allocation in the 31 GHz

---

[26/] Comments of Sierra at 11-12.

[27/] See Comments of CTA at 7-8; Comments of Hewlett-Packard Company at 4.

[28/] Comments of CTA at 6. See also Comments of Rio Vision at 1 (maintaining that LMDS requires a minimum of 1 GHz of contiguous spectrum).

band."[29] The Commission should not pass up this or any other opportunity that may be presented to resolve this matter in a mutually agreeable fashion.

25. IMSA also is encouraged by the fact that LMDS and traffic signal control interests have been pursuing various band-sharing options.[30] Along these lines, the City of Topeka believes that it is possible for its existing 31 GHz system and any potential LMDS system to operate in Topeka's Central Business District without creating unresolvable interference problems.[31]

26. In addition, IMSA appreciates the Hewlett-Packard Company's ("HP") "concern[] about the effect [of reallocation] on local municipalities using 31 GHz system [sic] for traffic light controls" and its desire to work with incumbent licensees to develop a solution to the problem.[32] However, IMSA cautions the Commission against HP's request that it "move forward with this proceeding with the understanding that the affected parties will negotiate a

---

[29] Comments of CTA at 6.

[30] See Comments of Hewlett-Packard Company at 3; Comments of Sierra at 15.

[31] Comments of the City of Topeka at ¶ 2.

[32] Comments of HP at 3.

solution for the incumbents in the 31 GHz band prior to LMDS auctions."[33/] Given the importance to the public of existing 31 GHz operations, their future viability should not rest upon the continued good will of parties with potentially divergent interests. Accordingly, the Commission should instead "move forward" with a plan to protect the rights of incumbents in the event that co-existence in the 31 GHz band proves unrealistic.

III. CONCLUSION

27. IMSA believes that the Commission's proposal to reallocate the 31 GHz band to LMDS on a primary protected basis is deficient in that it fails to consider the immense public value derived from existing 31 GHz traffic signal control operations and the burdens associated with the relocation of incumbent operations to alternative spectrum. Moreover, to comply with the directives of the National Environmental Policy Act, the Commission must assess the potential harmful effects of its proposed action on the air quality of numerous urban areas and attempt to develop solutions that better serve the public interest. Proper consideration of these factors, as well as the history and technical backdrop of 31 GHz operations, would compel the

---

[33/] Id.

conclusion that traffic management system licensees should neither be subjected to harmful interference nor displaced from the 31 GHz band without reimbursement for relocation costs.

WHEREFORE, THE PREMISES CONSIDERED, the International Municipal Signal Association respectfully urges the Federal Communications Commission to act in a manner fully consistent with the views expressed herein.

Respectfully submitted,

INTERNATIONAL MUNICIPAL SIGNAL ASSOCIATION

By _____

Martin W. Bercovici
Nicole B. Donath
KELLER AND HECKMAN LLP
1001 G Street, NW
Suite 500 West
Washington, DC 20001
(202) 434-4144

Their Attorneys

August 22, 1996

EXHIBIT A

INGRES TERMINAL MONITOR -- Copyright (c) 1981, 1992 Ingres Corporation

callsign	expire	tx_city	tx_sta	licensee
KA86431	010201		US	BOYKIN AND ASSOCIATES
KME49	000801		US	PACIFIC BELL
WLK466	010201		US	MCI TELECOMMUNICATIONS CORP
WLT827	910201		US	GENCELL MANAGEMENT, INC.
WML691	010201		US	MADISON CELLULAR TELEPHONE COMPANY
WMM399	010201		NY	ADIRONDACK CELLULAR TELEPHONE LP
WMN611	010201		US	REMOTE FACILITIES CONSULTING SERVICES
WMQ699	010201		US	NEW ENGLAND DIGITAL DISTRIBUTION INC
WMR352	010201		US	NEBRASKA CELLULAR TELEPHONE CORPORATION
WMS874	010201		US	TAURUS COMMUNICATIONS INC
WNTR417	980413	SANTA CLARA	CA	SANTA CLARA, CITY OF
WNTR498	980521	MONTCLAIR	CA	MONTCLAIR, CITY OF
WNTR499	980521	MONTCLAIR	CA	MONTCLAIR, CITY OF
WNTR500	980521	MONTCLAIR	CA	MONTCLAIR, CITY OF
WNTR502	980521	MONTCLAIR	CA	MONTCLAIR, CITY OF
WNTR504	980521	MONTCLAIR	CA	MONTCLAIR, CITY OF
WNTR505	980521	MONTCLAIR	CA	MONTCLAIR, CITY OF
WNTR507	980521	MONTCLAIR	CA	MONTCLAIR, CITY OF
WNTR826	980803	BURLINGTON	WA	WASHINGTON, STATE OF
WNTR886	981001	CUPERTINO	CA	CUPERTINO, CITY OF
WNTR887	981001	CUPTERTINO	CA	CUPERTINO, CITY OF
WNTR888	981001	CUPERTINO	CA	CUPERTINO, CITY OF
WNTR889	981001	CUPERTINO	CA	CUPERTINO, CITY OF
WNTR890	981001	CUPERTINO	CA	CUPERTINO, CITY OF
WNTS695	980907	SEATTLE	WA	WASHINGTON, STATE OF
WNTS696	980907	SEATTLE	WA	WASHINGTON, STATE OF
WNTS697	980907	SEATTLE	WA	WASHINGTON, STATE OF
WNTS698	980907	SEATTLE	WA	WASHINGTON, STATE OF
WNTS699	980907	SEATTLE	WA	WASHINGTON, STATE OF
WNTS700	980907	SEATTLE	WA	WASHINGTON, STATE OF
WNTS701	980907	SEATTLE	WA	WASHINGTON, STATE OF
WNTS702	980907	SEATTLE	WA	WASHINGTON, STATE OF
WNTS703	980907	SEATTLE	WA	WASHINGTON, STATE OF
WNTS880	981001	SAN BERNARDINO	CA	SAN BERNARDINO, CITY OF
WNTS881	981001	SAN BERNARDINO	CA	SAN BERNARDINO, CITY OF
WNTT654	990125	PETALUMA	CA	PETALUMA, CITY OF
WNTT655	990125	PETALUMA	CA	PETALUMA, CITY OF
WNTT656	990125	PETALUMA	CA	PETALUMA, CITY OF
WNTT952	990125	UPLAND	CA	UPLAND, CITY OF
WNTU750	990331	SAN BERNARDINO	CA	SAN BERNARDINO, COUNTY OF
WNTU875	990720	MONTCLAIR	CA	MONTCLAIR, CITY OF
WNTV232	990425	LA HABRA	CA	LA HABRA, CITY OF
WNTV245	990426	PALM SPRINGS	CA	PALM SPRINGS, CITY OF
WNTV448	990729	SIOUX CITY	IA	NUTRA FLO ITI
WNTV449	990729	SIOUX CITY	IA	NUTRA FLO ITI
WNTV598	990614	BRENTWOOD	CA	CONTRA COSTA, COUNTY OF
WNTV599	990614	BRENTWOOD	CA	CONTRA COSTA, COUNTY OF

WNTV600	990614	BRENTWOOD	CA	CONTRA COSTA, COUNTY OF
WNTW208	990823	TOPEKA	KS	TOPEKA, CITY OF
WNTW384	991007	DALY CITY	CA	DALE CITY, CITY OF
WNTW392	991007	CHARLOTTE	NC	CHARLOTTE, CITY OF
WNTW717	991129	IDAHO FALLS	ID	IDAHO FALLS, CITY OF
WNTW798	000328	TRACY	CA	TRACY, CITY OF
WNTX926	000418	MESA	AZ	LUTHERAN HEALTHCARE NETWORK
WNTY579	000418	SACRAMENTO	CA	CALIFORNIA, STATE OF
WNTZ734	000801	BULLHEAD CITY	AZ	BUDGET RENT A CAR OF NORTHERN ARIZONA
WNTZ735	000801	LAUGHLIN	NV	BUDGET RENT A CAR OF NORTHERN ARIZONA
WPJB264	001107	SAN FRANCISCO	CA	ACADEMY OF ART COLLEGE
WPJB265	001107	SAN FRANCISCO	CA	ACADEMY OF ART COLLEGE
WPJC807	010219	FRAMINGHAM	MA	PERSEPTIVE BIO SYSTEMS INC
WPJC808	010219	FRAMINGHAM	MA	PERSEPTIVE BIO SYSTEMS INC
WPJC925	010117	NATICK	MA	NATURAL MICROSYSTEMS INC
WPJC926	010117	NATICK	MA	NATURAL MICROSYSTEMS INC
WPJD491	010305	MILWAUKEE	WI	WISCONSIN, STATE OF DEPT OF TRANSPORTATION
WPJD492	010305	MILWAUKEE	WI	WISCONSIN, STATE OF DEPT OF TRANSPORTATION
WPJD930	010319	PALM SPRINGS	CA	PALM SPRINGS, CITY OF
WPJE982	010429	MARIETTA	GA	COBB, COUNTY OF
WPJF201	010409	MENLO PARK	CA	VENTURE LAW GROUP
WPJF202	010409	MENLO PARK	CA	VENTURE LAW GROUP
WPJF232	010429	SAN DIEGO	CA	SAN DIEGO, CITY OF

(70 rows)